

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,
vs.

Civil No.
Honorable

One (1) Remington Arms
Company, Inc. 870 Shotgun
CAL:12 SN:B382628M; Fifteen (15)
Rounds Winchester-Western
Ammunition CAL:12; and
Twenty-five (25) Rounds Unknown
Ammunition CAL:9,

Defendants *in Rem*.

_____ /

COMPLAINT FOR FORFEITURE

NOW COMES Plaintiff, the United States of America, by and
through Saima S. Mohsin, United States Attorney for the Eastern
District of Michigan, and Gjon Juncaj, Assistant United States
Attorney, and for its Complaint for Forfeiture states:

JURISDICTION AND VENUE

1. This is an *in rem* civil forfeiture action pursuant to 18 U.S.C.
§ 924(d).

2. This Court has original jurisdiction over this proceeding pursuant to 28 U.S.C. § 1345 because this action is being commenced by the United States of America as Plaintiff.

3. This Court has jurisdiction over this forfeiture action pursuant to 28 U.S.C. § 1355 (b)(1)(A) because the acts giving rise to the forfeiture occurred in the Eastern District of Michigan.

4. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the Plaintiff's claims occurred in the Eastern District of Michigan.

5. Venue is also proper before this Court pursuant to 28 U.S.C. § 1395(a), (b), and (c) because the action accrued and the Defendants *in rem* were seized and remain in the Eastern District of Michigan.

6. The Defendants *in rem* include:

a) One (1) Remington Arms Company, Inc. 870 Shotgun
CAL:12 SN:B382628M;

b) Fifteen (15) Rounds Winchester-Western Ammunition
CAL:12; and

c) Twenty-five (25) Rounds Unknown Ammunition CAL:9.

(collectively, Defendants *in rem*).

BACKGROUND INFORMATION

7. The Defendants *in rem* were involved in a knowing violation of 18 USC 922(g)(1) and are therefore subject to federal forfeiture pursuant to 18 U.S.C. § 924(d).

GENERAL ALLEGATIONS

8. On or about February 7, 2020, Ryan Lee Vanochten, knowing he had been convicted of a criminal offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a Remington Arms Company, Inc. 870 Shotgun CAL:12 SN:B382628M , Fifteen (15) Rounds Winchester-Western Ammunition CAL:12; and Twenty-five (25) Rounds Unknown Ammunition CAL:9, in violation of 18 USC 922(g)(1).

9. As a result the firearm and ammunition are forfeitable to the United States pursuant to 18 U.S.C. 924(d)(1).

COMPANION CRIMINAL CASE

10. There is a companion criminal case in the Eastern District of Michigan, *United States v. Ryan Vanochten*, Case No. 20-cr-20120, Ludington, J.

CLAIM FOR RELIEF

11. Plaintiff realleges and incorporates by reference each and every allegation contained in paragraphs 1 through 10 above, including any subparagraphs thereunder.

12. The Defendants *in rem* were involved in a knowing violation of 18 USC 922(g)(1) and are therefore subject to federal forfeiture pursuant to 18 U.S.C. § 924(d).

CONCLUSION

Plaintiff, the United States of America, respectfully requests that warrants for the arrest of the Defendants *in rem* be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the aforementioned Defendants *in rem* condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

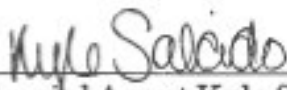
Saima S. Mohsin
Acting United States Attorney

s/GJON JUNCAJ
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(P63256)

Dated: March 8, 2021

VERIFICATION

I, KYLE SALCIDO, am a Special Agent of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). I have read the foregoing Complaint for Forfeiture and assert under penalty of perjury that the facts contained therein are true to the best of my knowledge and belief, based upon knowledge possessed by me and/or on information received from other law enforcement agents.



Special Agent Kyle Salcido
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

Dated: March 9, 2021